

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BERTHA GREEN	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 1:25-cv-00385-JRR
	:	
PRRC, INC. d/b/a PRICE RITE	:	
OF ROSEDALE PLAZA, et al.	:	
	:	
Defendants.	:	

**REPLY TO PLAINTIFF’S OPPOSITION TO
DEFENDANT’S MOTION FOR LEAVE TO AMEND NOTICE OF REMOVAL**

COMES NOW the Defendant, PRRC, Inc. d/b/a Price Rite of Rosedale Plaza, by and through its attorneys, Jennifer A. King, Esquire and DeCARO, DORAN, SICILIANO, GALLAGHER & DeBLASIS, LLP, and in response to Plaintiff’s Opposition to Defendant’s Motion for Leave to Amend Notice of Removal (ECF No. 19) states as follows:

Plaintiff’s Opposition completely ignores that the 30-day removal period has not expired and therefore amendments are permissible.¹ The operative date is not when PRRC was served; it is when PRRC was first able to ascertain removability. If this Court were to accept Plaintiff’s position, the end result would be that plaintiffs could preclude removal by simply failing to allege sufficient facts from which a defendant could ascertain removability in the complaint. Plaintiff does not argue diversity jurisdiction is not present. Rather, Plaintiff using her own inadequate pleading to deprive PRRC of its’ right to removal.

WHEREFORE, the Defendant, PRRC, Inc., d/b/a Price Rite of Rosedale Plaza, respectfully requests that Defendant’s Motion for Leave to File Amended Notice of and Petition for Removal

¹ PRRC did not discover the residency of all members of DDS Investments II, LLC until February 28, 2025. As such, the time for removal expires on March 31, 2025.

be and is hereby GRANTED, and that Defendant, PRRC, Inc., d/b/a Price Rite of Rosedale Plaza's Amended Petition for Removal is deemed timely filed.

Respectfully submitted,

DeCARO, DORAN, SICILIANO,
GALLAGHER & DeBLASIS, LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **27th** day of **March, 2025**, a copy of the foregoing Reply to Plaintiff's Opposition to Defendant's Motion for Leave to File Amended Petition for Removal was electronically filed and served upon:

Kim Parker, Esquire
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/s/Jennifer A. King
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